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16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 VPN.COM LLC,

19 *Plaintiff,*

20 Case No: 2:22-cv-04453-AB-MAR

21 vs.

22 GEORGE DIKIAN et al.

23 *Defendants.*

**STIPULATION AND ORDER TO  
MODIFY SCHEDULING ORDER**

**WHEREAS**, on May 03, 2023, this Court granted the parties' first request to extend certain case deadlines, including non-expert discovery cutoff to August 04, 2023;

**WHEREAS**, the parties now jointly request a second extension of non-expert discovery cutoff to September 04, 2023, so that the parties can attempt to fully complete discovery obligations;<sup>1</sup>

**IT IS THUS STIPULATED AND AGREED**, by and between the parties, through undersigned counsel, that the Scheduling Order be modified to the extent of extending non-expert discovery cutoff to September 04, 2023:

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

<sup>1</sup> It should be noted that Plaintiff has requested a longer extension of fact discovery, and also an adjournment of the current trial date, due to the myriad of unresolved discovery disputes between the parties, which will be impossible to resolve in 30 days. Defendant would not agree to any further extension of discovery or any adjournment of the trial date. Plaintiff intends to submit a motion for such relief, which the parties met and conferred on, and which Defendant intends to oppose.